

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

-----X	
AMDOCS (ISRAEL) LIMITED, an Israeli corporation,	:
	:
Plaintiff,	:
	:
vs.	:
	:
OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation,	:
	:
Defendants.	:

Case No. 1:10-cv-00910-LMB -TRJ

JURY TRIAL DEMANDED

SUPPLEMENTAL JOINT DISCOVERY PLAN

Pursuant to Fed. R. Civ. P. 26(f), counsel for plaintiff Amdocs (Israel) Limited (“Amdocs”) and for defendants Openet Telecom, Inc. and Openet Telecom Ltd. (collectively, “Openet”) conferred by telephone on December 17, 2010, and the parties hereby report on this meeting and submit this Supplemental Joint Discovery Plan, requesting the Court’s guidance on two issues that have prevented the parties from reaching agreement on a Stipulated Confidentiality and Protective Order. A draft of the parties’ Stipulated Confidentiality and Protective Order is attached.

The first issue, appearing at paragraph 13(h) of the attached draft, is whether information designated “Highly Confidential” under the Confidentiality and Protective Order should be accessible by two pre-designated in-house representatives at each of the parties. Amdocs believes that such access should be permitted, while Openet opposes.

The second issue, appearing at paragraph 14(a) of the attached draft, is whether the production of a computer containing the source code relevant to the issues in this litigation should be made available at the offices of outside counsel for the party requesting that information, or if the production should be made at the offices of outside counsel of the party required to produce the source code. Amdocs believes that source code should be made available at the offices of the outside law firm of the party requesting the information, while Openet believes that source code should be made available for inspection at the offices of the outside law firm of the party producing the information.

The parties respectfully request the opportunity to articulate the reasons for their differing views at the Scheduling Conference on December 22, and that the Court provide its guidance on these issues. After receiving the Court's guidance, the parties will finalize the Stipulated Confidentiality and Protective Order and file it for the Court's review.

Respectfully submitted,

<p>By: _____/s/_____ Brian H. Pandya James H. Wallace, Jr. (pro hac vice) Eric H. Weisblatt (VSB No. 21561) Anthony Son (pro hac vice) Brian H. Pandya (VSB No. 72233) WILEY REIN LLP 1776 K Street NW Washington, D.C. 20006 Telephone: (202) 719-7000 Facsimile: (202) 719-7049 Emails: jwallace@wileyrein.com, eweisblatt@wileyrein.com, ason@wileyrein.com, bpandya@wileyrein.com</p> <p>Attorneys for Defendants</p>	<p>_____/s/_____ Gregory H. Lantier (Bar. No. 65657) WILMER, CUTLER, PICKERING, HALE AND DORR LLP 1875 Pennsylvania Avenue, N.W. Washington, DC 20006 Phone: (202) 663-6000 Fax: (202) 663-6363</p> <p>Attorney for Plaintiff</p>
	<p><i>Of counsel:</i></p> <p>Nels T. Lippert S. Calvin Walden Laura A. Sheridan WILMER, CUTLER, PICKERING, HALE AND DORR LLP 399 Park Avenue New York, New York 10022 Phone: (212) 230-8800 Fax: (212) 230-8888</p>

December 17, 2010